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WASHINGTON, DC 20090-6456 I am writing to you to comment on the USDA's proposed organic rule. I strongly believe that the proposed national organic regulations, as currently set forth by the USDA is not compatible or consistent with current organic practices. In fact, I believe that the current draft of regulations actually lowers the standard for the organic industry.

The organic industry has developed and maintained high standards that consumers have grown to trust and expect from the certified organic label. I wish not for this trust to be broken. I ask you to PLEASE review and consider the voice of the NOSB for the following proposed rules that I feel will really hurt the organic industry and the health of the living creatures on this planet.

#1. I ask that you not ignore the recommendations of the National Organic Standard Board (NOSB). Please write the rule according to the recommendations of the NOSB and recognize their authority. They have the expertise, credibility, and legal authority to make these important and often controversial decisions regarding the national organic regulations. [205.20-205.28]

#2. I ask that you eliminate unwanted materials from organic production including; sewage sludge, genetically engineered organisms (GEO), and food irradiation.

GEO's are an unproved technology that the organic system does not need in order to grow high quality nutritious food. There is not enough scientific data documenting the long term impact that GEOs will have on the environment or human health.

Food irradiation (ionizing radiation) is a synthetic process that has never been allowed in organic production. The long term effects of irradiation are still unknown and it is not a panacea to food safety concerns.

Sewage sludge from municipal waste may contain heavy metals and toxins, therefore, is not appropriate for use on the land where food is to be grown for human consumption. The use of sludge has never been allowed in organic food production and is completely unnecessary.

In conclusion, sewage sludge and ionizing radiation are unacceptable and would along with GEOs place U.S. standards in conflict with existing industry practice, consumer expectations, and international trade and standards. [205.2, 205.7-205.9, 205.22, 205.26, 205.17]

#3. I urge you to require higher standards for livestock. Please, again, adhere to the recommendations of the NOSB. [205.13-205.15, 205.22, 205.24] The organic industry expects the regulations to include the use of 100% organic feed and consumers expect absolutely no antibiotics in organic meat and dairy products.

#4. Please don't price small farms and small scale certifiers out of business. Please use a sliding scale fee system and reduce the impact on small operators. There is no need for jobs to be lost! [205.421-205.424]

#5. Please stay out of the eco-label business. So many comments and problems are arising just from defining "organic standards". Please stick with defining "organic" and leave other "green" labels alone such as "pesticide free", "no antibiotics or hormones", "humanely raised", etc.. [205.103]

#6. I ask you not to ignore historical land use practices. Again, please listen to the NOSB recommendations that suggest that land must be free of prohibited/toxic substances for at least three years before it is able to become certified organic. Food grown on contaminated land can contain toxic residues and endanger human health.

#7. I urge the enforcement of certification standards, currently placed in the hands of the private certifiers. I ask not that the authority to decertify growers, processors, and manufacturers to be placed solely in the hands of the Secretary of Agriculture. These certification agencies have built up a great reputation and have earned respect from the organic industry over the years. I ask not that you rip the rug out from beneath them.

In conclusion, I ask that you please listen and take heart to the public's comments and suggestions. We simply want to eat good healthy food and not destroy the environment in doing so!!!!

Very sincerely,